

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

_____	)	
CRYSTAL MOTOR EXPRESS, INC.,	)	
	)	
<i>Plaintiff,</i>	)	
	)	CIVIL ACTION NO. 04-11450-RGS
	)	
TOWN OF LYNNFIELD,	)	
	)	
<i>Defendant.</i>	)	
_____	)	

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Now come the parties and hereby move this Honorable Court to issue an Order amending the scheduling order by extending the dates by a brief ninety days, in accordance with the Proposed Amended Scheduling Order attached hereto as Exhibit "A".

As grounds for this motion, the parties state that the Proposed Amended Scheduling Order accurately reflects the amount of time reasonably anticipated at this time by the parties and their attorneys to prepare the case for trial. The additional time is expected due to the number of documents and potential witnesses contained in the parties' automatic disclosures.

This is the first requested extension of the scheduling order proposed by the parties.

WHEREFORE, the parties respectfully request that this Court amend the Scheduling Order in accordance with the Proposed Amended Scheduling Order attached hereto.

Respectfully submitted,

TOWN OF LYNNFIELD

CRYSTAL MOTOR EXPRESS, INC.

By its attorney,

By its attorneys,

\s\ John Cloherty (E.C.)  
John Cloherty (BBO# 566522)  
Ten Winthrop Square  
Boston, MA 02110  
(617) 350-0950

\s\ Edward V. Colbert III  
Wesley S. Chused (BBO#083520)  
Edward V. Colbert III (BBO#566187)  
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LOONEY & GROSSMAN, LLP  
101 Arch Street  
Boston, Massachusetts 02110  
(617) 951-2800

Date: March 30, 2005

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

_____	)	
CRYSTAL MOTOR EXPRESS, INC.,	)	
	)	
<i>Plaintiff,</i>	)	
	)	CIVIL ACTION NO. 04-11450-RGS
	)	
TOWN OF LYNNFIELD,	)	
	)	
<i>Defendant.</i>	)	
_____	)	

**PROPOSED AMENDED SCHEDULING ORDER**

1. Non-expert discovery including all depositions shall be completed by August 1, 2005.
2. Plaintiff's expert witnesses shall be disclosed pursuant to Fed. R. Civ. P. 26(a)(2) by September 1, 2005.
3. Defendant's expert witnesses shall be disclosed pursuant to Fed. R. Civ. P. 26(a)(2) by October 3, 2005.
4. Expert witness depositions shall be taken within 45 days from the service of the defendant's expert reports under Fed. R. Civ. P. 26(a)(2)(B).
5. Dispositive motions shall be filed by December 30, 2005, and responses due 30 days thereafter.

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By the Court: